Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Deregulation/Privatization of Equipment Registration and Telephone Network Connection Rules	)	CC Docket No. 99-216

COMMENTS OF SPRINT CORPORATION

Sprint Corporation ("Sprint") on behalf of its local, long distance and wireless divisions, accepts the Commission staff's invitation to comment on the FCC's public fora held July 12 and 13, 1999, regarding the proposed deregulation/privatization of Part 68 rules. Therefore, in addition to the filing made in this docket on July 2, 1999, Sprint offers the following comments.

In summary, it is Sprint's opinion – and, it believes, the consensus of the three industry segments (carriers, manufacturers, and independent test labs) represented at the fora - that:

a) carriers' networks must be protected;

b) one uniform set of national technical requirements is necessary;

c) there are few if any excessive technical requirements;

d) the Commission needs to remain involved in network protection activities; and

e) certain functions (specifically, technical rule development, lab qualification and application processing) currently performed by the Commission could be transferred to industry.

During the fora, the Commission's staff expressed some reservation about the need for continued regulations aimed at protecting the network. Sprint reminds the Commission,

however, that the electrical characteristics taken for granted today are a legacy from a time when customer premise equipment ("CPE") was provided by carriers and such protections were an integral part of the network. These protections that were originally designed as a part of carrier-provided CPE exist today in third-party CPE precisely because Part 68 rules exist and, therefore, it is essential to maintain the same level of protective electrical characteristics into the future.

At the fora, SBC described in graphic detail at least one instance of known network harm that resulted from non-compliant CPE. There are no doubt countless more stories that could be shared on this same point. The paradox of the situation is this – the fact that network harm continues to occur because of non-compliant equipment, no matter the number of incidents, provides all the support necessary to justify the continuation of Part 68 regulations. Similarly, one can reasonably infer that the fact that there are not overwhelming numbers of incidents of harm reflects the success of the present process and thus also provides strong support for the continued existence of the protection requirements.

Practically speaking, it would not make economic sense to remove these regulations. An absence of uniform controls would require carriers to attempt to monitor and control each item of CPE attached to the millions of existing access lines. Not only would this impose a great burden on the carriers, but it also would be monumentally inefficient. The present system, on the other hand, is relatively efficient from the perspective of consumer total cost for both CPE and network services.

The Commission's staff has also expressed concern about the number of network protection regulations currently in existence. For comparison sake, Sprint suggests that these technical requirements are but a small subset of the performance requirements for

CPE[1]. These performance requirements are quite voluminous in comparison to their Part 68 counterparts. However, as government and industry have gained experience with third party CPE connected to the North American network, several requirements have been removed from the rules. During the U.S. and Canada terminal attachment rules harmonization process, the manufacturers pressed the carriers to re-justify the electrical requirements, and several requirements were removed at that time. As a result, the Commission's technical connection requirements are among the fewest in number in the developed world. The current rules embody a well-designed process that capitalizes on the natural tension among carriers, CPE manufacturers, and Government. That process should not be disturbed merely for the sake of having fewer written regulations.

Many of the commenters in this docket, as well as the fora participants, have made reference to "Part 68 experts." While considering the comments, the Commission must keep in mind that there are several facets to the Part 68 process and thus several specific types of "experts." For example, CPE manufacturers and third party test labs collectively are experts only at the aspects of developing terminal designs, testing terminals, and applying for Part 68 certification of terminals. Carriers and network equipment manufacturers are experts only at planning and managing networks, including adding new technology and recovering from network problems of all kinds. Thus, both the carriers and network equipment manufacturers possess relevant network harm knowledge.

[1] CPE sold by any responsible vendor must: a) protect the network; b) be compatible with the network and end users; and c) be immune to common environmental stresses. Industry POTS compatibility and immunity requirements are in ANSI T1.401 and ANSI/TIA/EIA-470-B, 464-B, 571, 631, and 716.

It is the norm for these carriers to then participate in their "home" ANSI Standards Development Organization ("SDO"), Committee T1 of the Alliance for Telecommunications Industry Solutions ("ATIS"). To reduce Commission expenditures, Sprint recommends that any further changes in the electrical Part 68 requirements be made only after recommendation by a qualified SDO. Because many carriers and the network equipment manufacturers participate in Committee T1 of the ATIS, Sprint believes Committee T1 is the best-qualified SDO for this work[2].

The Commission's Part 68 process now provides for staff management, including unofficial lab approval and unofficial rules in the form of the Application Guide. The process also provides for maintenance of a national database. Importantly, the Part 68 process also provides for an FCC vendor ID, model ID, and national compliance mark. Each of these management functions needs to continue in some form.

Finally, after serious consideration of the comments offered during the fora, Sprint recommends privatization through the Telecommunications Certification Bodies ("TCB") process as originated in the Commission's modification of the equipment authorization process for telephone terminal equipment[3]. Implementation plans for TCBs were developed through the efforts of the Commission's staff and the industry in the first half of 1999. This process will allow for both network protection and rapid implementation of new technology with minimal Commission involvement.

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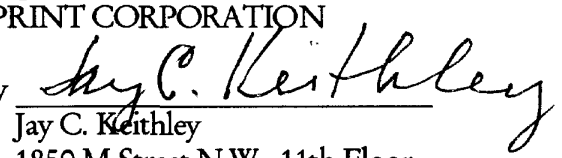
[2] TIA TR-41.9 usually has only nominal U.S. carrier participation at any given time, which is insufficient considering the gravity of the issue at hand.

[3] *In the Matter of 1998 Biennial Regulatory Review -- Amendment of Parts 2, 25 and 68 of the Commission's Rules to Further Streamline the Equipment Authorization Process for Radio Frequency Equipment, Modify the Equipment Authorization Process for Telephone Terminal Equipment, Implement Mutual Recognition Agreements and Begin Implementation of the Global Mobile Personal Communications by Satellite (GMPCS) Arrangements*, 13 FCC Rcd 10683, rel. May 18, 1998.

Respectfully submitted,
SPRINT CORPORATION

By 

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July 20, 1999

CERTIFICATE OF SERVICE

I, Joyce Y. Walker, hereby certify that I have on this 20th day of July 1999, served via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Comments of Sprint Corporation," In the Matter of Deregulation/Privatization of Equipment Registration and Telephone Network Connection Rules (Part 68), CC Docket No. 99-216, filed this date with the Secretary, Federal Communications Commission, to the persons listed below.

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